



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

June 12, 2020

VIA ECF

The Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Nicholas Truglia*, 19 Cr. 921 (AKH)

Dear Judge Hellerstein:

The Government writes to respectfully request that the Court schedule an initial conference in this case for a date in approximately 60 days and exclude time under the Speedy Trial Act. On December 19, 2019, the defendant was charged in a two-count Indictment with participating in a wire fraud conspiracy, in violation of Title 18, United States Code, Section 1349, and participating in a money laundering conspiracy, in violation of Title 18, United States Code, Section 1956(h). At the time, the defendant was incarcerated in California on state charges, which remain pending. On or about April 8, 2020, the defendant was released on bail in the California case. On April 15, 2020, the defendant was arraigned in the Southern District of New York by Magistrate Judge Robert W. Lehrburger. At the conclusion of that proceeding, Judge Lehrburger set a control date of June 15, 2020, and excluded time under the Speedy Trial Act between April 15, 2020, and June 15, 2020.


The Government is in the process of producing discovery, which includes a significant quantity of business records and electronic evidence. The parties accordingly request that the Court set an initial conference date in approximately 60 days and exclude time under the Speedy Trial Act between June 15, 2020, and the conference date set by the Court. The ends of justice served by granting such an exclusion outweigh the best interest of the public and the defendant in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A). An exclusion is warranted in order to allow additional time for the Government to produce and the defendant to review discovery, additional time that is particularly warranted in light of the ongoing COVID-19 pandemic. An exclusion is

*Initial conf is set for
August 17, 2020 @ 11:00 a.m.
time is excluded until
the interest of justice
is served
K. [Signature]
6-12-2020*

also warranted to allow the parties time to engage in discussions of a potential pretrial resolution of this case.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By: 
Timothy Capozzi
Assistant United States Attorney
(212) 637-2404

cc: Mark Gombiner, Esq., Federal Defenders of New York